

REMARKS

Claims 1-24 are pending. Claims 1-24 are rejected under 35 U.S.C. §112, second paragraph. Claims 1, 4-9, 12-17 and 20-24 are rejected under 35 U.S.C. §102(b). Claims 2-3, 10-11 and 18-19 are rejected under 35 U.S.C. §103(a). Applicants address these rejections below.

Applicants thank Examiner Joseph for discussing the rejections under 35 U.S.C. §112, second paragraph, with Applicants' Attorney, Bobby Voigt, on November 14, 2007.

I. REJECTIONS UNDER 35 U.S.C. §112, SECOND PARAGRAPH:

The Examiner has rejected claims 1-24 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Office Action (8/21/2007), page 2. In particular, the Examiner asserts that claims 1, 4, 8, 9, 12, 16, 17, 22 and 24 contain optional claim language by using phrases with the term "if." Applicants respectfully traverse.

Applicants amended claims 1, 4, 9, 12 and 17 to remove the phrase "if the preselected communication channel is a duplex channel" or the phrase "if the communication channel is a duplex channel" in order to broaden the scope of the claimed inventions. No new matter has been added. By removing these phrases, the Examiner's basis for rejecting claims 1, 4, 9, 12 and 17 under U.S.C. §112, second paragraph, is moot.

Further, as indicated above, Applicants amended claims 6, 8, 14, 16, 22 and 24 to clarify the claimed subject matter by restating the phrases with the term "if." No new matter has been added. By restating these phrases, the Examiner's basis for rejecting claims 6, 8, 14, 16, 22 and 24 under U.S.C. §112, second paragraph, is moot.

As stated above, claims 1, 4, 9, 12 and 17 were amended to broaden the scope of the claimed inventions and not to overcome prior art. Further, claims 6, 8, 14, 16, 22 and 24 were amended to clarify the claimed subject matter and not to overcome

prior art. Additionally, claims 1, 4, 9, 12 and 17 were amended to correct typographical mistakes and not to overcome prior art. Hence, no prosecution history estoppel arises from the amendments to claims 1, 4, 6, 8, 9, 12, 14, 16, 17, 22 and 24. *Festo Corp. v. Shoketsu Kinzoku Kogyo Kabushiki Co.*, 62 U.S.P.Q.2d 1705, 1711-12 (2002); 56 U.S.P.Q.2d 1865, 1870 (Fed. Cir. 2000). Further, the amendments made to claims 1, 4, 6, 8, 9, 12, 14, 16, 17, 22 and 24 were not made for a substantial reason related to patentability and therefore no prosecution history estoppel arises from such amendments. See *Festo Corp.*, 62 U.S.P.Q.2d 1705 at 1707 (2002); *Warner-Jenkinson Co. v. Hilton Davis Chemical Co.*, 41 U.S.P.Q.2d 1865, 1873 (1997).

Consequently, Applicants respectfully assert that claims 1-24 are allowable under 35 U.S.C. §112, second paragraph, and respectfully request the Examiner to withdraw the rejections of claims 1-24 under 35 U.S.C. §112, second paragraph.

II. REJECTIONS UNDER 35 U.S.C. §102(b):

The Examiner has rejected claims 1, 4-9, 12-17 and 20-24 under 35 U.S.C. §102(b) as being anticipated by Paxton et al. (U.S. Patent Application Publication No. 2002/0007292) (hereinafter "Paxton"). Applicants respectfully traverse these rejections for at least the reasons stated below and respectfully request the Examiner to reconsider and withdraw these rejections.

For a claim to be anticipated under 35 U.S.C. §102, each and every claim limitation must be found within the cited prior art reference and arranged as required by the claim. M.P.E.P. §2131.

Applicants respectfully assert that Paxton does not disclose "the queue order information comprises a patron-selectable set of queue order information, the patron-selectable set including the current estimated time remaining and the current position of the patron in the queue" as recited in claim 1 and similarly in claims 9 and 17. The Examiner cites paragraphs [0054, 0056, 0059 and 0073] of Paxton as disclosing the above-cited claim limitations. Office Action (8/21/2007), page 3. Applicants respectfully traverse.

Paxton instead discloses that at a predetermined time estimate, the central processor will send a signal to the patron's receiver to inform the patron that she has a certain amount of time to travel back to the ride location and check-in. [0054]. Paxton further discloses that at a predetermined time interval, the central processor will send a demand to the specific patron indicated at step 46, where the demand is of a Boolean nature where the patron must decide whether or not she is going to make it to the ride. [0056]. Additionally, Paxton discloses that the bilateral communication between the central processor and the patrons' receivers can be accomplished by a variety of transmitter/receiver implementations. [0059]. Furthermore, Paxton discloses that if the patron receives a signal from the transmitter that she has 20 minutes to attend the attraction and she would like to be placed at a lower priority place-holding on the queue, the patron would make a request at the kiosk for a lower priority place-holding to replace the present higher priority place-holding. [0073].

Hence, Paxton discloses a patron receiver receiving a signal informing the patron that the patron has a certain amount of time to travel back to the ride location and check-in. Further, Paxton discloses sending a demand to a patron where the patron must decide whether or not he/she is going to make it to the ride. Additionally, Paxton discloses that the patron can make a request at a kiosk for a lower priority place-holding.

There is no language in the cited passages that discloses that the patron-selectable set includes the current estimated time remaining and the current position of the patron in the queue. Thus, Paxton does not disclose all of the limitations of claims 1, 9 and 17, and thus Paxton does not anticipate claims 1, 9 and 17. M.P.E.P. §2131.

Claims 4-8 each recite combinations of features of independent claim 1, and hence claims 4-8 are not anticipated by Paxton for at least the above-stated reasons that claim 1 is not anticipated by Paxton.

Further, claims 12-16 each recite combinations of features of independent claim 9, and hence claims 12-16 are not anticipated by Paxton for at least the above-stated reasons that claim 9 is not anticipated by Paxton.

Additionally, claims 20-24 each recite combinations of features of independent claim 17, and hence claims 20-24 are not anticipated by Paxton for at least the above-stated reasons that claim 17 is not anticipated by Paxton.

Claims 4-8, 12-16 and 20-24 recite additional features, which, in combination with the features of the claims upon which they depend, are not anticipated by Paxton.

For example, Paxton does not disclose "wherein the steps (a), (b) and (c) are repeated at a preselected notification criterion, and wherein a preselected notification interval comprises a patron-selected notification criterion" as recited in claim 4 and similarly in claims 12 and 20. The Examiner cites paragraph [0054] of Paxton as disclosing the above-cited claim limitations. Office Action (8/21/2007), page 3. Applicants respectfully traverse.

Paxton instead discloses that at a predetermined time interval, the central processor will send a demand to the specific patron indicated at step 46. [0054]. Paxton further discloses that as seen in Figure 2, the demand is of a Boolean nature where the patron must decide whether or not she is going to make it to the ride. [0054]. Additionally, Paxton discloses that if for example, the patron is enjoying her time at the waterpark and cannot possibly get ready in time for the ride she can simply deny the demand and the central processor 50 will then remove her place-holding from the queue 52. [0054]. Furthermore, Paxton discloses that this demand step can be very useful for handling open spots that develop in the queue. [0054].

Hence, Paxton disclose a central processor sending a demand to a specific patron to have the patron decide whether or not he/she is going to make it to the ride.

There is no language in the cited passage that discloses that the steps (a), (b) and (c) are repeated at a preselected notification criterion. Neither is there any language in the cited passage that discloses that a preselected notification interval comprises a patron-selected notification criterion. Thus, Paxton does not disclose all of the limitations of claims 4, 12 and 20, and thus Paxton does not anticipate claims 4, 12 and 20. M.P.E.P. §2131.

Applicants further assert that Paxton does not disclose "wherein the patron-selected notification criterion comprises one of a set including a preselected notification time interval and a preselected queue position" as recited in claim 5 and similarly in claims 13 and 21. The Examiner cites paragraph [0056] of Paxton as disclosing the above-cited claim limitation. Office Action (8/21/2007), page 4. Applicants respectfully traverse.

Paxton instead discloses that it is advantageous to have the leadtime from when the demand is made to when the patron is expected to arrive at the ride (e.g. 15-30 minutes). [0054]. Paxton further discloses that this leadtime provides the central processor more time to address the problems of open slots developing in the queue discussed *infra*. [0054]. Hence, Paxton discloses a central processor sending a demand to a specific patron to have the patron decide whether or not he/she is going to make it to the ride. Paxton further discloses that this demand should be sent to the patron in advance of when the patron is expected to arrive at the ride.

There is no language in the cited passage that discloses that the patron-selected notification criterion comprises one of a set including a preselected notification time interval and a preselected queue position. Thus, Paxton does not disclose all of the limitations of claims 5, 13 and 21, and thus Paxton does not anticipate claims 5, 13 and 21. M.P.E.P. §2131.

Applicants further assert that Paxton does not disclose "(d) notifying the patron upon reaching a head of the queue using the communication channel; and (e) in response to the patron failing to respond after an expiry of a predetermined time interval after step (d), moving the patron to another position within the queue" as recited in claim 6 and similarly in claims 14 and 22. The Examiner cites paragraphs [0031 and 0067] of Paxton as disclosing the above-cited claim limitations. Office Action (8/21/2007), page 4. Applicants respectfully traverse.

Paxton instead discloses that if the central processor detects that the best travel time exceeds the available time the patron has to get to the ride, the central processor will send a signal to the receiver indicating this dilemma. [0031]. Paxton further discloses that if the patron agrees that they cannot make the ride in time they can

accept a higher open place-holding in the queue. [0031]. Furthermore, Paxton discloses that when the patron gets to the ride location he/she will then look at the display of his/her device to find his/her number ID. [0067].

There is no language in the cited passages that discloses notifying the patron upon reaching a head of the queue using the communication channel. Neither is there any language in the cited passages that discloses that in response to the patron failing to respond after an expiry of a predetermined time interval, moving the patron to another position within the queue. Thus, Paxton does not disclose all of the limitations of claims 6, 14 and 22, and thus Paxton does not anticipate claims 6, 14 and 22. M.P.E.P. §2131.

Applicants further assert that Paxton does not disclose "wherein the another position within the queue is an end of the queue" as recited in claim 7 and similarly in claims 15 and 23. The Examiner cites paragraph [0031] of Paxton as disclosing the above-cited claim limitation. Office Action (8/21/2007), page 5. Applicants respectfully traverse.

Paxton instead discloses that if the central processor detects that the best travel time exceeds the available time the patron has the get to the ride, the central processor will send a signal to the receiver indicating this dilemma. [0031]. Paxton further discloses that if the patron agrees that they cannot make the ride and time they can accept a higher open place-holding in the queue. [0031].

There is no language in the cited passage that discloses that the another position within the queue is an end of the queue. Thus, Paxton does not disclose all of the limitations of claims 7, 15 and 23, and thus Paxton does not anticipate claims 7, 15 and 23. M.P.E.P. §2131.

Applicants further assert that Paxton does not disclose "in response to the patron being at the head of the queue, determining if the patron can be accommodated; and in response to the patron not being accommodated, interchanging the current position of the patron and position of a next patron in the queue" as recited in claim 8 and similarly in claims 16 and 24. The Examiner cites paragraphs [0067

and 0073] of Paxton as disclosing the above-cited claim limitations. Office Action (8/21/2007), page 5. Applicants respectfully traverse.

Paxton instead discloses that as seen in Figure 6, the display screen 80c indicates 41,071 in the upper portion and 41,100 in the lower portion. [0067]. Paxton further discloses that this indicates a low value and high-value of a range. [0067]. Paxton additionally discloses that at this point our patron would determine that 41,084 is in between 41,071 and 41,100 and she would then venture to the gate 82c and transmit her device through the device receiving mechanism 84c. [0067]. Furthermore, Paxton discloses that the device receiving mechanism reads the patron's ID and queries this ID with that specific gate's ID range and if the ID is in between the range the patron will be allowed admittance. [0067]. Additionally, Paxton discloses that the user interface system on the kiosk in one form would retrieve lower priority place-holdings that have recently become available and display the proximate wait times for these place-holdings to the patron. [0073].

Hence, Paxton discloses admitting the patron based on if the patron's ID is within a range of IDs associated with a gate. Further, Paxton discloses that if the patron makes a request for a lower priority place-holding, the user interface system on the kiosk would retrieve lower priority place-holdings that have recently become available and display the proximate wait times for these place-holdings to the patron.

There is no language in the cited passages that discloses that in response to the patron being at the head of the queue then determining if the patron can be accommodated. Neither is there any language in the cited passages that discloses that in response to the patron not being accommodated, interchanging the current position of the patron and position of a next patron in the queue. Thus, Paxton does not disclose all of the limitations of claims 8, 16 and 24, and thus Paxton does not anticipate claims 8, 16 and 24. M.P.E.P. §2131.

As a result of the foregoing, Applicants respectfully assert that not each and every claim limitation was found within Paxton, and thus claims 1, 4-9, 12-17 and 20-24 are not anticipated by Paxton. M.P.E.P. §2131.

III. REJECTIONS UNDER 35 U.S.C. §103(a):

The Examiner has rejected claims 2, 10 and 18 under 35 U.S.C. §103(a) as being unpatentable over Paxton in view of Thangavelu (U.S. Patent No. 4,838,384). The Examiner has further rejected claims 3, 11 and 19 under 35 U.S.C. §103(a) as being unpatentable over Paxton in view of Holland et al. (U.S. Patent Application Publication No. 2002/0143605) (hereinafter "Holland"). Applicants respectfully traverse these rejections for at least the reasons stated below, and respectfully request the Examiner to reconsider and withdraw these rejections.

A. Claims 2, 10 and 18 are not properly rejected under 35 U.S.C. §103(a) as being unpatentable over Paxton in view of Thangavelu.

1. Paxton and Thangavelu, taken singly or in combination, do not teach or suggest at least the following claim limitations.

Applicants respectfully assert that Paxton and Thangavelu, taken singly or in combination, do not teach or suggest "wherein the set of historical data comprises a queue servicing rate for a preceding time interval, the estimated time remaining determined using a linear extrapolation with said queue servicing rate" as recited in claim 2 and similarly in claims 10 and 18. The Examiner cites column 13, lines 25-29 of Thangavelu as teaching the above-cited claim limitations. Office Action (8/21/2007), page 6. Applicants respectfully traverse.

Thangavelu instead teaches that the average passenger arrival rate for three minutes is computed knowing the arrival rate for one three-minute interval and the arrival rate for the next three-minute interval, using appropriate linear interpolation or extrapolation. Column 13, lines 25-29.

There is no language in the cited passage that teaches that the set of historical data comprises a queue servicing rate for a preceding time interval, the estimated time remaining determined using a linear extrapolation with the queue servicing rate. Instead, Thangavelu teaches estimating the passenger arrival rate. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claims 2, 10 and 18, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

2. Examiner's rationale for modifying Paxton with Thangavelu to include the missing claim limitations of claims 2, 10 and 18 is insufficient to establish a *prima facie* case of obviousness.

Most if not all inventions arise from a combination of old elements. See *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1457 (Fed. Cir. 1998). Obviousness is determined from the vantage point of a hypothetical person having ordinary skill in the art to which the patent pertains. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1457 (Fed. Cir. 1998). Therefore, an Examiner may often find every element of a claimed invention in the prior art. *Id.* However, identification in the prior art of each individual part claimed is insufficient to defeat patentability of the whole claimed invention. See *Id.* In order to establish a *prima facie* case of obviousness, the Examiner must show reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner claimed. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998). The Examiner must provide articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. *KSR International Co. v. Teleflex Inc.*, 82 U.S.P.Q.2d 1385, 1396 (U.S. 2007).

As understood by Applicants, the Examiner admits that Paxton does not teach "wherein the set of historical data comprises a queue servicing rate for a preceding time interval, the estimated time remaining determined using a linear extrapolation with said queue servicing rate" as recited in claim 2 and similarly in claims 10 and 18. Office Action (8/21/2007), page 6. The Examiner asserts that Thangavelu teaches the above-cited missing claim limitations. *Id.* The Examiner's reasoning for modifying Paxton with Thangavelu to include the above-cited claim limitations is "to estimate the average arrival passenger rate, as taught in Thangavelu Col. 13 lines 25-29." *Id.* The Examiner's reasoning is insufficient to establish a *prima facie* case of obviousness in rejecting claims 2, 10 and 18.

As stated above, the Examiner cites column 13, lines 25-29 of Thangavelu as support for the Examiner's reasoning for modifying Paxton with Thangavelu to include the missing claim limitations of claims 2, 10 and 18. Thangavelu teaches that the average passenger arrival rate for three minutes is computed knowing the arrival

rate for one three-minute interval and the arrival rate for the next three-minute interval, using appropriate linear interpolation or extrapolation. Column 13, lines 25-29. There is no language in Thangavelu (and in particular column 13, lines 25-29) that makes any suggestion to have the set of historical data comprise a queue servicing rate for a preceding time interval, where the estimated time remaining is determined using a linear extrapolation with the queue servicing rate (missing claim limitations) in order to compute the average passenger arrival rate. The Examiner has simply cited to an arbitrary passage in Thangavelu that teaches computing an average passenger arrival rate and then concludes that the Examiner has provided appropriate reasoning. The Examiner has to provide some rational connection between the cited passage that is the source of the Examiner's reasoning and the missing claim limitations. The Examiner's source of reasoning (column 13, lines 25-29 of Thangavelu) does not provide reasons as to why one skilled in the art would modify Paxton to include the missing claim limitations of claims 2, 10 and 18. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 2, 10 and 18. *KSR International Co. v. Teleflex Inc.*, 82 U.S.P.Q.2d 1385, 1396 (U.S. 2007).

Further, the Examiner's reasoning ("to estimate the average arrival passenger rate") does not provide reasons, as discussed further below, that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would modify Paxton to include the above-indicated missing claim limitations of claims 2, 10 and 18. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 2, 10 and 18. *KSR International Co. v. Teleflex Inc.*, 82 U.S.P.Q.2d 1385, 1396 (U.S. 2007); *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998).

Paxton addresses the problem of substantially removing lines for attractions. [0005-0009]. The Examiner has not provided any reasons as to why one skilled in the art would modify Paxton (which teaches substantially removing lines for attractions) to have the set of historical data comprise a queue servicing rate for a preceding time interval, where the estimated time remaining is determined using a linear extrapolation with the queue servicing rate (missing claim limitations). The

Examiner's rationale ("to estimate the average arrival passenger rate") does not provide such reasoning.

There is no rational connection between estimating the average arrival passenger rate (Examiner's reasoning) and estimating the time remaining using a linear extrapolation with the queue servicing rate (missing claim limitation). Hence, the Examiner's rationale does not provide reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would modify Paxton to include the missing claim limitations of claims 2, 10 and 18. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 2, 10 and 18. *KSR International Co. v. Teleflex Inc.*, 82 U.S.P.Q.2d 1385, 1396 (U.S. 2007); *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998).

B. Claims 3, 11 and 19 are not properly rejected under 35 U.S.C. §103(a) as being unpatentable over Paxton in view of Thangavelu and in further view of Holland.

1. Paxton, Thangavelu and Holland, taken singly or in combination, do not teach or suggest at least the following claim limitations.

Applicants respectfully assert that Paxton, Thangavelu and Holland, taken singly or in combination, do not teach or suggest "wherein the queue servicing rate comprises a rate at which patrons have been served between a current time and a preceding notification time and wherein the set of historical data further comprises seasonal average patron service rates" as recited in claim 3 and similarly in claims 11 and 19. The Examiner cites paragraph [0024] of Paxton as teaching the first wherein clause and cites paragraph [0007] of Holland as teaching the second wherein clause. Office Action (8/21/2007), page 6. Applicants respectfully traverse.

Paxton instead teaches that, because the visitor has a virtual placeholder in the queue at the time of her request, she has the 1001 spot which of course counts down (10 per two minutes in our example) as other visitors that have high priority placeholders ahead of our visitor's placeholder go through the ride. [0024]. Paxton

further teaches that during this interim time our visitor can look at other portions of the park or even go on less crowded rides that have a lower wait time. [0024].

There is no language in the cited passage that teaches or suggests that the queue servicing rate comprises a rate at which patrons have been served between a current time and a preceding notification time.

Further, Holland instead teaches that the member may desire to track the customer demand for a product on a product-by-product basis, a market-by-market basis, a seasonal basis, etc. [0007].

There is no language in the cited passage that teaches or suggests that the set of historical data further comprises seasonal average patron service rates. Instead, Holland teaches tracking the customer demand for a product on a seasonal basis.

As a result of the foregoing, the Examiner has not presented a *prima facie* case of obviousness in rejecting claims 3, 11 and 19, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

2. Examiner's rationale for modifying Paxton with Holland to include the missing claim limitations of claims 3, 11 and 19 is insufficient to establish a *prima facie* case of obviousness.

As stated above, most if not all inventions arise from a combination of old elements. See *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1457 (Fed. Cir. 1998). Obviousness is determined from the vantage point of a hypothetical person having ordinary skill in the art to which the patent pertains. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1457 (Fed. Cir. 1998). Therefore, an Examiner may often find every element of a claimed invention in the prior art. *Id.* However, identification in the prior art of each individual part claimed is insufficient to defeat patentability of the whole claimed invention. See *Id.* In order to establish a *prima facie* case of obviousness, the Examiner must show reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner claimed. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998). The Examiner

must provide articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. *KSR International Co. v. Teleflex Inc.*, 82 U.S.P.Q.2d 1385, 1396 (U.S. 2007).

The Examiner admits that Paxton does not teach "wherein the set of historical data further comprises seasonal average patron service rates" as recited in claim 3 and similarly in claims 11 and 19. Office Action (8/21/2007), page 6. The Examiner asserts that Holland teaches the above-cited missing claim limitation. *Id.* The Examiner's reasoning for modifying Paxton with Holland to include the above-cited claim limitation is "to track service demand on a seasonal basis, as taught in Holland para. 7." *Id.* The Examiner's reasoning is insufficient to establish a *prima facie* case of obviousness in rejecting claims 3, 11 and 19.

As stated above, the Examiner cites paragraph [0007] of Holland as support for the Examiner's reasoning for modifying Paxton with Holland to include the missing claim limitation of claims 3, 11 and 19. Holland teaches that the member may desire to track the customer demand for a product on a product-by-product basis, a market-by-market basis, a seasonal basis, etc. [0007]. There is no language in Holland (and in particular paragraph [0007]) that makes any suggestion to have the set of historical data further comprise seasonal average patron service rates (missing claim limitation) in order to track customer demand for a product on a seasonal basis. Further, there is no language in paragraph [0007] that focuses on tracking service demand as suggested by the Examiner. Instead, paragraph [0007] of Holland teaches tracking customer's demand for a given product. The Examiner has to provide some rational connection between the cited passage that is the source of the Examiner's reasoning and the missing claim limitation. The Examiner's source of reasoning (paragraph [0007] of Holland) does not provide reasons as to why one skilled in the art would modify Paxton to include the missing claim limitation of claims 3, 11 and 19. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 3, 11 and 19. *KSR International Co. v. Teleflex Inc.*, 82 U.S.P.Q.2d 1385, 1396 (U.S. 2007).

IV. CONCLUSION:

As a result of the foregoing, it is asserted by Applicants that claims 1-24 in the Application are in condition for allowance, and Applicants respectfully request an allowance of such claims. Applicants respectfully request that the Examiner call Applicants' attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining issues.

Respectfully submitted,

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